

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

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In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,  Debtors. <sup>1</sup>	PROMESA Title III  No. 17 BK 3283-LTS  (Jointly Administered)
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**JOINT INFORMATIVE MOTION  
REGARDING ONE HUNDRED SEVENTY-SIXTH OMNIBUS OBJECTION  
TO CLAIMS SCHEDULED TO BE HEARD AT FEBRUARY 1, 2021 HEARING**

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To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court’s *Order Regarding Procedures for Hearing on February 1, 2021* [Case No. 17-3283, ECF No. 15732] (the “Procedures Order”), the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Commonwealth of Puerto Rico (the “Commonwealth”), pursuant to section 315(b) of the *Puerto*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> and Consolidated Waste Services, LLC (“ConWaste,” and, collectively, the “Parties”) respectfully submit this joint informative motion:

1. The Parties will appear telephonically at the February 1, 2021 hearing on the *One Hundred Seventy-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Claims Asserting Liabilities Owed by Entities That Are Not Title III Debtors* [**Case No. 17-3283, ECF No. 12143**] (the “Objection”), as well as any and all responses, statements, joinders, and replies to the Objection.

2. The following individuals may appear to speak on behalf of the Parties:

- a. Commonwealth: Laura Stafford, and/or Brian S. Rosen
- b. ConWaste: Lourdes Arroyo

3. The Parties propose the Court allocate 18 minutes for a hearing on the Objection.

The Parties have agreed to allocate such time as follows:

- a. Commonwealth:
  - i. Commonwealth: 8 minutes
- b. Objecting Party:
  - i. ConWaste: 8 minutes
- c. Debtor’s Rebuttal:
  - i. Commonwealth: 2 minutes

WHEREFORE, the Parties respectfully request that the Court take notice of the above.

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<sup>2</sup> PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

Dated: January 27, 2021  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen  
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Brian S. Rosen  
(Admission *pro hac vice*)  
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